

EXHIBIT 3

STATE OF WASHINGTON
PIERCE COUNTY SUPERIOR COURT

DEPARTMENT OF LABOR AND
INDUSTRIES OF THE STATE OF
WASHINGTON,

Plaintiff,

v.

GEO SECURE SERVICES LLC,

Defendant.

NO. 24-2-05626-8

DECLARATION OF ERIC SMITH

I, Eric Smith, declare under the penalty of perjury under the laws of the United States that the following is true and correct.

1. I am over the age of eighteen and am otherwise competent to testify. I make these statements on personal knowledge and belief.
2. I am a Region 3 Compliance Safety and Health Investigator with the Department of Labor and Industries. I have worked for L&I since January 2020. I am an industrial hygienist.
3. In May 2022, I inspected GEO's workplace. This was an unannounced inspection, and I was allowed to inspect the facility.
4. On December 29, 2023, I obtained a warrant to inspect GEO Secure Services LLC's workplace at the Northwest ICE Process Center.

DECLARATION OF ERIC SMITH

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ATTORNEY GENERAL OF WASHINGTON
LABOR & INDUSTRIES DIVISION
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7740

1 5. Matt Williams and I arrived at the NWIPC and served the warrant to three individuals
2 at GEO's workplace, including Michael Knight. He is the GEO Assistant Facility
3 Administrator. Despite the warrant, Ryan Jennings, ICE Supervisory Detention and
4 Deportation Officer, refused us entry. He wanted us to contact the ICE Field Office
5 Director to schedule a formal tour of the facility.

6 6. I have had a background check.

7 7. On January 4, 2024, Matt Williams and I went to Pierce County Courthouse. We
8 learned that the court decided to assign a search warrant number to this entry warrant.
9 The clerk told us we did not need to file this warrant with the courthouse with a cause
10 number because it now has a search warrant number. The clerk gave us a copy of the
11 warrant with a warrant number (as attached to the Declaration of Anastasia Sandstrom,
12 together with the application and declaration for the warrant).

13 DATED this 29 day of February, 2024 in Tacoma, Washington by

14
15 *Eric Smith*

16 Eric Smith
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